

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIAN FLORES aka JULIAN FLORES
SANCHEZ,

Plaintiff,

v.

WELLS FARGO BANK N.A.,

Defendant.

Case No. 2:19-cv-01254-RSL

REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF MOTION TO DISMISS
AMENDED COMPLAINT BY
WELLS FARGO BANK, N.A.

NOTE ON MOTION CALENDAR:
June 4, 2021

Pursuant to Federal Rule of Evidence 201, defendant Wells Fargo Bank, N.A. submits this Request for Judicial Notice in support of its contemporaneously filed Motion to Dismiss Amended Complaint and requests that the Court take judicial notice of Exhibits A through H.

The Court may take judicial notice of documents filed in other court proceedings. *Mahoney v. Holder*, 62 F. Supp. 3d 1215, 1219 (W.D. Wash. 2014) (“The Court may take judicial notice of ‘proceedings in other courts, both within and without the federal judicial system, if those proceedings have a direct relation to matters at issue.’”). The exhibits attached

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1 to this Request for Judicial Notice were filed in *In Re Julian Flores aka Julian Flores Sanchez*,
2 No. 11-20512-TWD (Bankr. W.D. Wash. filed Sept. 1, 2011).

3 Wells Fargo requests that the Court take judicial notice of the following documents:

4 Exhibit A: Chapter 13 Plan (Dkt. No. 43), filed Feb. 14, 2012;

5 Exhibit B: Docket Entry, Order Confirming Chapter 13 Plan (Dkt. No. 45), filed
6 March 23, 2012;

7 Exhibit C: Motion For Relief From Stay and Co-Debtor Stay or In The Alternative
8 For Adequate Protection by Ally Financial, Inc. (Dkt. No. 77), filed March 30, 2017;

9 Exhibit D: Debtor's Response to Creditor's Motion for Relief From Stay Re: 2007
10 Chevrolet Express CA (Dkt. No. 79), filed April 12, 2017;

11 Exhibit E: Notice of Trustee's Motion to Dismiss Case and Hearing (Dkt. No. 80),
12 filed April 17, 2017;

13 Exhibit F: Order Granting Relief From Stay and Co-Debtor Stay to Ally Financial,
14 Inc. (Dkt. No. 85), filed April 18, 2017;

15 Exhibit G: Notice of Trustee's Motion to Dismiss Case and Hearing (Dkt. No. 93),
16 filed September 18, 2017;

17 Exhibit H: Order Dismissing Case (Dkt. No. 97), filed December 1, 2017.

18 DATED May 7, 2021.

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22 K&L GATES LLP

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24 By: /s/ Peter A. Talevich
25 Peter A. Talevich, WSBA # 42644
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CERTIFICATE OF SERVICE

I certify that on May 7, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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